



August 21, 2020

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Hon. John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Application granted.
SO ORDERED.

New York, NY
August 24, 2020

/s/ John G. Koeltl
John G. Koeltl
U.S.D.J.

Re: *United States v. Stern, et al., No. 16 Cr. 525 (JGK)*

Dear Judge Koeltl:

We write on behalf of the defendant, Joseph Stern, regarding a request for travel to New Jersey to participate in his granddaughter's family wedding celebration. Mr. Stern is currently on home confinement but has been out of prison since December 2019. He was released to a halfway house on December 20, 2019 and put on halfway house home confinement through the end of his term of incarceration. He was released to his own home and placed on home confinement on July 7, 2020 as part of the supervised release portion of his sentence. His home confinement terminates on January 7, 2020.

The conditions of his supervised release allow Mr. Stern to reside in either Brooklyn or the Catskills but he must notify his probation officer if he changes locations. He is currently residing in the Catskills. Mr. Stern must request "schedules" for the following activities, the only activities for which he is permitted out of his home without special approval:

- 1) Employment, probation visits, attorney visits, and medical appointments (no limit)
- 2) Shopping up to 3 hours per week
- 3) Laundry up to 4 hours per week
- 4) Haircut or nails up to 4 hours per month
- 5) Religious observation up to 4 hours per week
- 6) Gym/exercise 2 hours per day with a maximum of 3 times per week (doctor's note prescribing exercise needed)

Any other activities require Court approval. Mr. Stern has remained in compliance with the conditions of his home confinement and supervised release since his release from prison.

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Mr. Stern's granddaughter is getting married on August 31, 2020 and he would like to join the family for the wedding ceremony and celebrations. This would require travel on the following dates:

- August 30, 2020: Mr. Stern would drive from the Catskills where he is currently residing to Brooklyn in order to prepare for the wedding ceremony.
- August 31, 2020: Mr. Stern would travel from Brooklyn to New Jersey for the wedding ceremony.
- August 31, 2020 - September 4, 2020: Mr. Stern would travel back to Brooklyn and remain in Brooklyn for the week, participating in a family wedding dinner celebration on September 3, 2020.
- September 4, 2020 – September 6, 2020: Mr. Stern would travel to New Jersey for the post-wedding Sabbath and remain in New Jersey with his family for the weekend.
- September 5, 2020: Mr. Stern would drive back to the Catskills.

Mr. Stern's Probation Officer, Ryan Lehr, approves of the above requested travel.

The Government does not oppose this request.

Thus, Mr. Stern respectfully requests approval of the above travel in order to celebrate his granddaughter's wedding with his family.

We appreciate the Court's consideration of this request.

Respectfully yours,

/S/

L. Barrett Boss
S. Rebecca Brodey

Counsel for Defendant Joseph Stern

cc: AUSA Andrew Adams, AUSA Benet Kearney, AUSA Noah Falk